

## REMARKS

This application has been reviewed in light of the Office Action dated November 30, 2004. Claims 1, 3, 16, 18, and 32-52 are presented for examination. Claims 2, 4-15, 17, and 19-31 have been canceled, without prejudice or disclaimer of subject matter. Claims 1, 3, 16, and 18 have been amended to define still more clearly what Applicant regards as his invention. Claims 32-52 have been added to provide Applicant with a more complete scope of protection. Claims 1, 16, and 38 are in independent form. Favorable reconsideration is requested. The canceled claims will not be further addressed herein.

Claims 1, 3, 16, and 18 have been rejected as anticipated by U.S. Patent 6,775,245 (*Ishida et al.*).

As shown above, Applicant has amended independent Claims 1 and 16 in terms that more clearly define what he regards as his invention. Applicant submits that these amended independent claims and new independent Claim 38, together with the remaining claims dependent thereon, are patentably distinct from the cited prior art for at least the following reasons.

The aspect of the present invention set forth in Claim 1 is an image processing apparatus having a plurality of image processing means for performing predetermined image processing on input image data and for outputting processed image data. The image processing apparatus includes creation means, and transfer means. The creation means creates packet data by adding to the image data a header in which image processing information is described. The transfer means transfers the packet data between the creation means and the plurality of image processing means. One of the plurality of image processing means performs image processing on the image data included in the packet data transferred by the transfer means on a basis of the

image processing information described in the header of the packet data, and recreates packet data by adding the processed image data to a header in which the image processing information is described. The transfer means transfers the recreated packet data to another of the plurality of image processing means.

Among other notable features of Claim 1 is that a plurality of image processing means perform predetermined image processing on input image data and that image processing is performed on the image data included in the packet data transferred by the transfer means on a basis of the image processing information described in the header of the packet data.

*Ishida et al.* relates to a data transfer control device performing isochronous and asynchronous data transfers. The Office Action cites column 6, lines 37-48, of *Ishida et al.* as an example of an asynchronous subaction depicted in FIG. 1A. One subaction consists of arbitration, packet transfer, and acknowledgment. In other words, the transfer of data takes precedence after an arbitration process relating to the right of use of the bus is performed. After the arbitration process, a packet is transferred from a source node (the originator of the transfer) to a destination node (the destination of the transfer). A source ID and a destination ID are comprised within the header of the packet. The destination node reads the destination ID and determines whether or not the packet is addressed to itself. If the destination node accepts the packet, it sends an acknowledgment (ACK) packet back to the source node. That is, *Ishida et al.* merely transfers data per packet unit so as to transfer data among a plurality of nodes connected to a bus and that information identifying the destination ID is located within the packet.

However, nothing has been found in *Ishida et al.* that would teach or suggest that a plurality of image processing means (nodes) perform predetermined image processing on input image data and that the image processing is performed on the image data included in the packet

data transferred by the transfer means on a basis of the image processing information described in the header of the packet data, as recited in Claim 1.

For at least the above reason, Applicant submits that Claim 1 is clearly patentable over *Ishida et al.*

Independent Claim 16 is a method claim corresponding to apparatus Claim 1, and is believed to be patentable over *Ishida et al.* for at least the same reasons as discussed above in connection with Claim 1.

The aspect of the present invention set forth in Claim 38 is an image processing apparatus for performing image processing on image data. The image processing apparatus includes a first image processing unit adapted to perform first image processing on image data, a second image processing unit adapted to perform second image processing on image data, and a creating unit creating first packet data by adding to the image data a header in which an image processing mode of either the first image processing or the second image processing is at least described. The apparatus also includes a transferring unit adapted to transfer the first packet data created by the creating unit to the first image processing unit. The first image processing unit performs the first image processing on the image data included in the first packet data on a basis of the image processing mode, related to the first image processing and described in the header included in the first packet data, and transfers the image data on which the first image processing is performed to the second image processing unit. That is, an image processing mode is described in first packet data created by the creating unit, and the first image processing unit transfers the image data performed by the first image processing to the second image processing unit while performing first image processing based on the image processing mode related to first image processing.

As discussed above in connection with Claim 1, *Ishida et al.* merely discusses that data is transferred per packet unit so as to transfer data among a plurality of nodes connected to a bus and that information identifying the destination ID is located within the packet.

For reasons similar to those discussed above in connection with Claim 1, nothing has been found in *Ishida et al.* that would teach or suggest performing first image processing on the image data included in the first packet data on a basis of the image processing mode, related to the first image processing and described in the header included in the first packet data, as recited in Claim 38.

Accordingly, independent Claim 38 is believed to be patentable over *Ishida et al.* for reasons substantially the same as those discussed above in connection with Claim 1.

The other claims in this application are each dependent from one or another of the independent claims discussed above and are therefore believed patentable for the same reasons. Since each dependent claim is also deemed to define an additional aspect of the invention, however, the individual consideration or reconsideration, as the case may be, of the patentability of each on its own merits is respectfully requested.

In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration and early passage to issue of the present application.

Applicant's undersigned attorney may be reached in our New York office by telephone at (212) 218-2100. All correspondence should continue to be directed to our below listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Frank A. DeLucia', written over a horizontal line.

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